AT&T / Ameritech
Phase I Read Out - July 1 1997

- There were failures on lines 2,3,4,6,7,8,11 tested in round A
- There were failures on lines 8,11 tested in Round B

- It was known at Trial start that the 900# translation would not work as hoped

LCC	Round A	Round B
unrestricted	ok	ok
900	failure	ok
976	failure	ok
900/976	failure	ok
toll	ok	ok
international	failure	failure
900/976/toll	failure	ok
900/976/international	failure	ok

call category	Round A	Round B
Operator	failure	ok
DA	failure	ok
Carrier Access	failure	ok
Direct Dial & int'l	failure	failure
Service Access (700)	failure	ok
Public Announce	ok	ok
Mass Calling	ok	ok
Card & Collect, 3rd	failure	ok
Per Use Features	ok	ok
Features	ok	failure

LOCAL AND TOLL CALL FLOWS AND INTERCARRIER BILLING IN THE COMPETITIVE TELECOMMUNICATIONS ENVIRONMENT

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INTRODUCTION

This paper describes the ideal call flows and billing between competing local exchange carriers in the new competitive telecommunications environment. This paper covers those call flows and billing between an ILEC and a CLEC, between two CLECs, and between CLECs and IXCs, when the CLEC provides service to end users through total service resale (TSR), or through the unbundled network elements platform (UNE), or through facility based networks (FBN).

This paper covers the call flows and billing for the following calls:

Local Calls, Intra-Switch
Local Calls, Inter-Switch
Toll Calls, IntraLATA
Toll Calls, Intrastate (InterLATA)
Toll Calls, Interstate (InterLATA)

The principles and assumptions that apply to these call flows and billing are:

In the descriptions that follow, AT&T is a CLEC. Where the terms 'CLEC A' and 'CLEC B' are used, CLEC A is AT&T and CLEC B is another CLEC.

The rate structure for the unbundled switching element will consist of a flat rate port and minute of use switching charge for originating minutes and a minute of use switching charge for terminating minutes.

Flat rated UNE charges for switching and the loop are not noted in these descriptions because they are not dependent on the call flows.

The UNE common elements include signaling elements, operator services and directory assistance platforms (where used) and common transport elements. Negotiators need to ensure that signaling is included in the switching charge. If not, the ILEC may impose signaling link, STP and signaling message charges. These must be reviewed by the Pricing team and the Public Policy team. For example, the Ameritech tariff for unbundled elements assumes signaling in the unbundled switching element.

Reciprocal compensation applies only where the parties own the assets (FBN) or have the right to act as if they own the assets (UNE). Resellers are not entitled to reciprocal compensation. UNE and FBN carriers are entitled to receive reciprocal compensation from the ILEC who is providing the TSR service. The ILEC will seek reciprocal compensation for calls to its customers and for calls to TSR customers from UNE and FBN carriers.

The originating UNE CLEC or ILEC pays for the transport to the terminating CLEC or ILEC on local calls.

Shared transport is a new term for a blended rate of common direct transport and common transport through tandem switched arrangements, and includes the UNE tandem switching element. If a shared transport rate is not available, then the transport should be either common direct or common through tandem switched arrangements.

When billing arrangements appear to cancel each other, e.g., when an ILEC bills a UNE terminating switching charge to a CLEC and the CLEC, in turn, bills the ILEC for the termination of a call, billing efficiencies would be realized by a permanent bill and keep arrangement. This assumes that the UNE rates and the reciprocal compensation rates are equal.

Until access charge reform is in effect, or 6/30/97, or RBOC in-region entry, the ILEC may apply the CCL charge and 75% of the RIC charge for access for interstate toll calls made by end users served by a CLEC using UNE arrangements. Access charges may differ state to state and state to interstate for CLECs using UNE arrangements. It is AT&T's interpretation that, pursuant to FCC Rule Section 51.515(c) - application of intrastate access charges - ILECs may only assess intrastate access charges comparable to those listed in 51.515(b) (CCL and 75% of the RIC) upon UNE carrier customers, and only then until the earliest of the following: 6/30/97; the date a PSC decides that ILECs may not assess such charges or, with respect to an RBOC, the date on which it is authorized to offer in-Region interLATA service.

If a state has an intrastate access charge structure that is different from the FCC access charge model, or if a state does not apply access charges to intraLATA toll calls, then those existing structures should be applied to the call flows described in this paper. This policy paper does not intend to imply that the existing structures should be changed.

The ILEC will provide call records for every call flow for all usage sensitive unbundled elements to the appropriate originating and terminating UNE carrier even where the CLEC offers flat rate local service. Necessary records will be provided to the UNE carriers so they can bill end users and third party carriers and validate billing from the ILEC or third party carriers. If that kind of detailed recording is not available it may appear to the terminating UNE CLEC that the call originated from the ILEC, even though it may have originated from another CLEC. In that situation, if the terminating CLEC imposes a terminating charge on the ILEC, the ILEC may, in turn, impose a terminating charge on the originating CLEC.

This paper does not address, in detail, reciprocal compensation between carriers with facility-based networks or meet-point billing arrangements between non-ILEC carriers. Those topics are covered in other policy papers.

LOCAL CALLS - INTRASWITCH

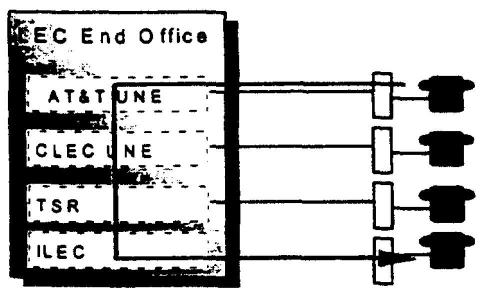
TOTAL SERVICE RESALE

When a CLEC provides local exchange service through a TSR arrangement, the call flows between a CLEC customer and an ILEC customer, or between two CLEC customers both served by the same switch are not different from the call flows between two ILEC customers. No incremental billing applies.

UNBUNDLED NETWORK ELEMENTS

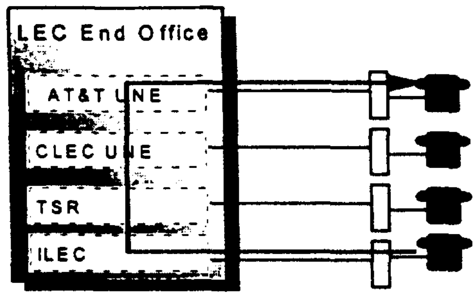
When CLECs provide local exchange service through UNE arrangements the call flows using a single switch are as follows. These scenarios assume that all CLECs are providing service through UNE and an ILEC switch:

1. CLEC Originating and ILEC Terminating



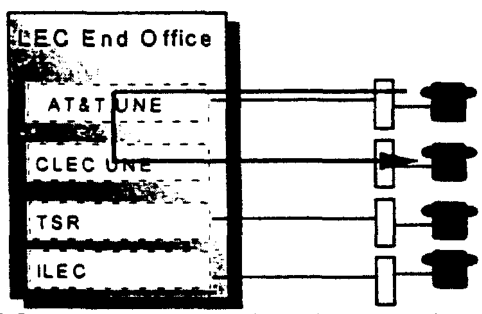
The ILEC will bill the originating CLEC one UNE switching charge, not two. If the ILEC billed a terminating switching charge that would be double recovery of the switch.

2. ILEC Originating and CLEC Terminating



There will be no charges. If the ILEC billed the UNE terminating switching charge to AT&T (the terminating CLEC), then AT&T could bill the ILEC for terminating the call. The two bills would cancel each other.

3. CLEC Originating and CLEC Terminating

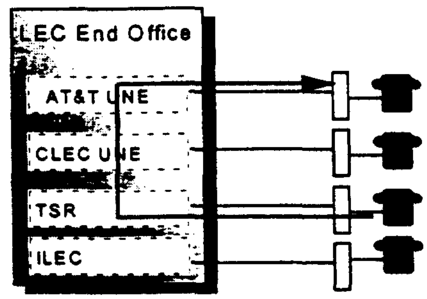


The ILEC will bill the originating CLEC one UNE switching charge and won't bill the terminating CLEC. To do so would be double recovery of the switch.

TOTAL SERVICE RESALE / UNBUNDLED NETWORK ELEMENTS

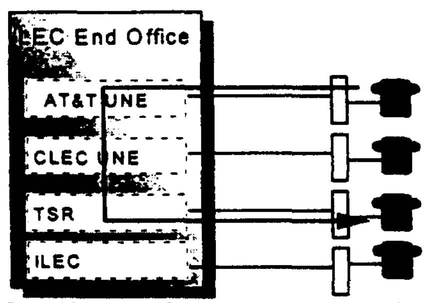
When one CLEC provides local exchange service through a TSR arrangement and another CLEC provides local exchange service through UNE arrangements, the call flows using a single switch are as follows:

4. CLEC (TSR) Originating and CLEC (UNE) Terminating



No incremental charges. This call flow is the same as #2.

5. CLEC (UNE) Originating and CLEC (TSR) Terminating



There will be no charges between the CLECs. The ILEC will bill the originating CLEC one UNE switching charge.This call flow is the same as #1.

LOCAL CALLS - INTERSWITCH

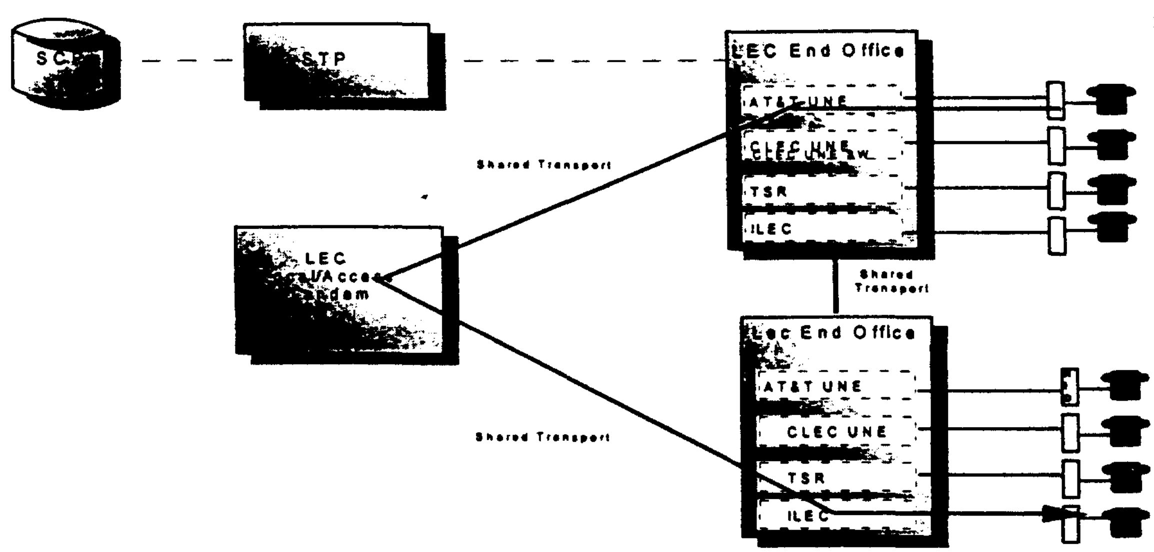
TOTAL SERVICE RESALE

When a CLEC provides local exchange service through a TSR arrangement, the call flows between a CLEC TSR customer and an ILEC customer, or between two CLEC TSR customers are not different from the call flows between two ILEC customers. No incremental billing applies.

UNBUNDLED NETWORK ELEMENTS

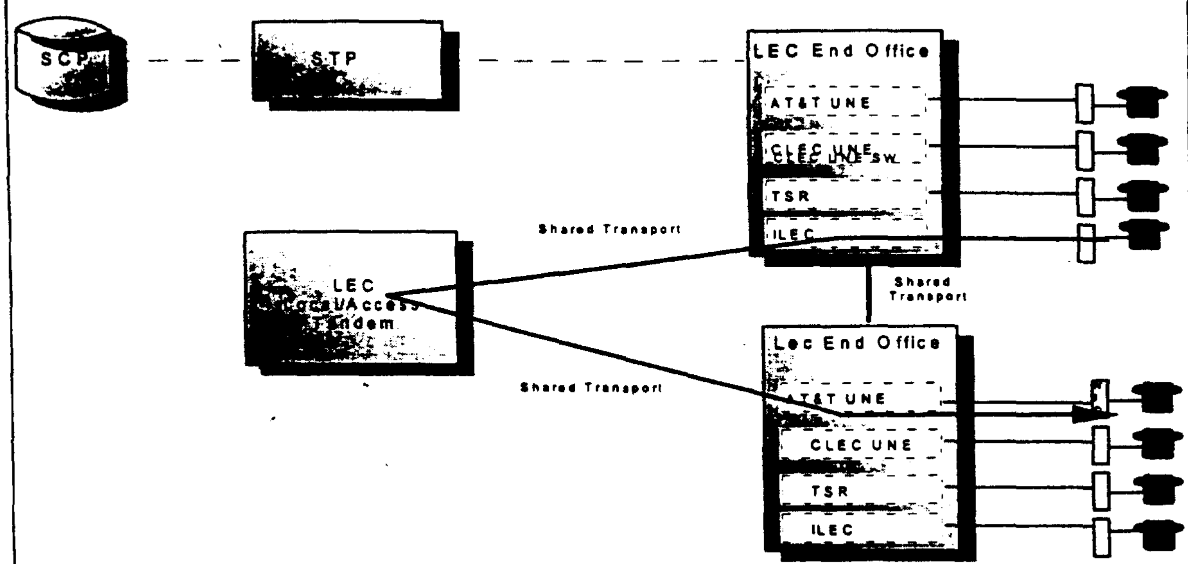
When CLECs provide local exchange service through UNE arrangements the call flows through two switches are as follows. These scenarios assume that all CLECs are providing service through UNE and ILEC switches:

6. CLEC Originating and ILEC Terminating



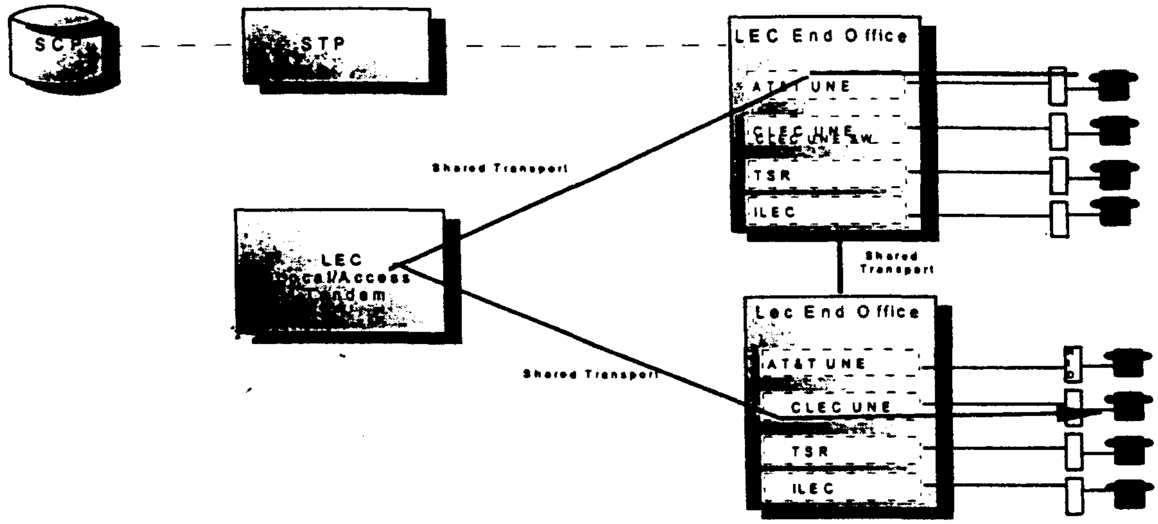
The ILEC will bill the CLEC one UNE originating switching charge and a shared transport charge. If bill and keep compensation is in place, there will be no terminating switching charge imposed by the ILEC on the CLEC. If there is no bill and keep compensation in place, the ILEC may impose a terminating switching charge on the originating CLEC.

7. ILEC Originating and CLEC Terminating



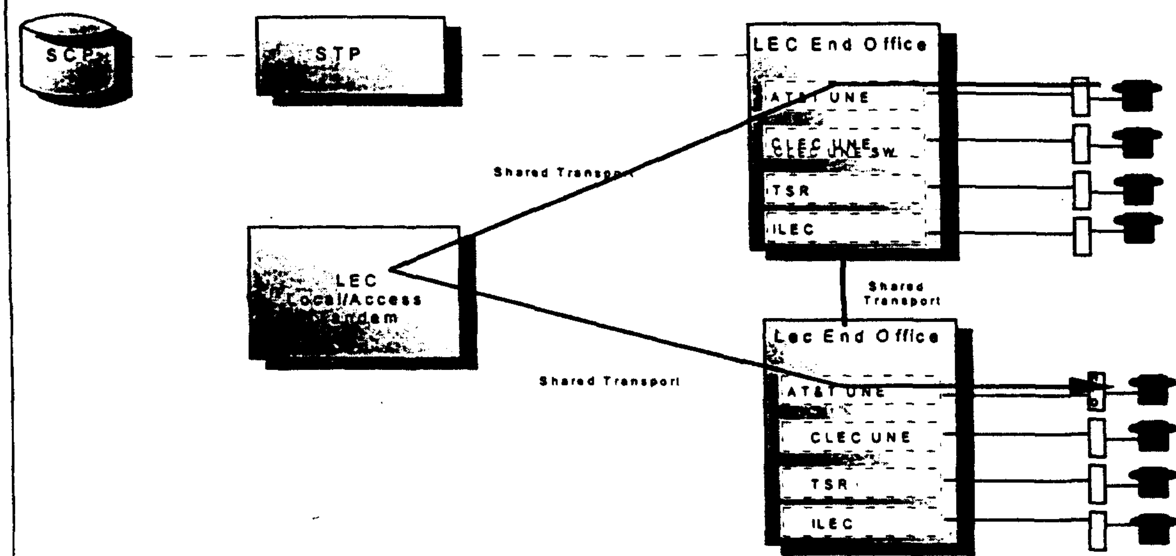
The ILEC will bill the CLEC for one UNE (terminating) switching charge. If bill and keep compensation is in place, then the CLEC will not impose a terminating charge on the ILEC. If bill and keep is not in place, then the CLEC may impose a terminating charge on the ILEC.

8. CLEC A Originating and CLEC B Terminating



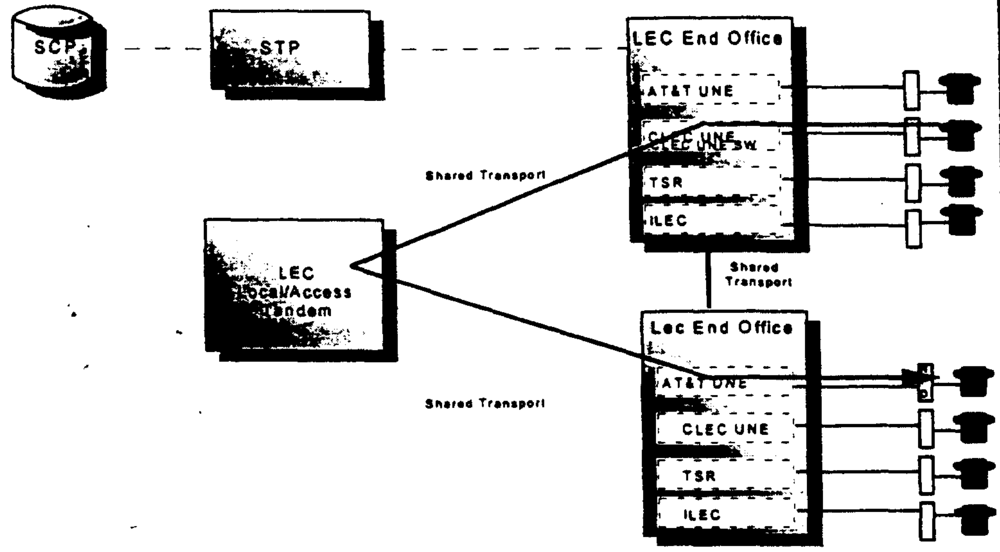
The ILEC will bill the originating CLEC (AT&T) one UNE originating switching charge and a shared transport charge. The ILEC will bill CLEC B for one UNE terminating switching charge. CLEC B must deal directly with AT&T for reciprocal compensation, unless they have agreed upon a bill and keep arrangement. See the assumption on recording in the Introduction. [In the absence of detailed recording, in the UNE environment, it may appear to the terminating CLEC that the call originated from the ILEC. If a terminating charge is imposed on the ILEC by the terminating CLEC B, then the same amount can be charged by the ILEC to the originating CLEC.]

9. CLEC A Originating and CLEC A Terminating



The ILEC will bill the CLEC (AT&T) one UNE originating switching charge, one UNE terminating switching charge and a shared transport charge. AT&T will not bill itself for reciprocal compensation.

10. CLEC B Originating and CLEC A Terminating

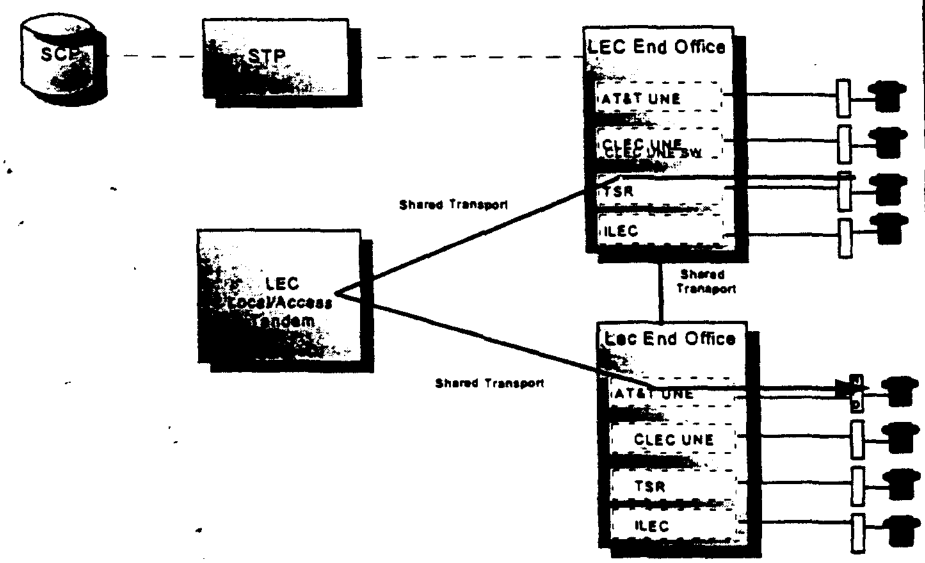


The ILEC will bill the terminating CLEC (AT&T) one UNE terminating switching charge and no shared transport charge. The ILEC will bill CLEC B for one UNE originating switching charge and a shared transport charge. AT&T must deal directly with CLEC B for reciprocal compensation, unless they have agreed upon a bill and keep arrangement. See the assumption on recording in the Introduction. [In the absence of detailed recording, in the UNE environment, it may appear to the terminating CLEC that the call originated from the ILEC. If a terminating charge is imposed on the ILEC by the terminating CLEC then the same amount can be charged by the ILEC to the originating CLEC.]

TOTAL SERVICE RESALE / UNBUNDLED NETWORK ELEMENTS

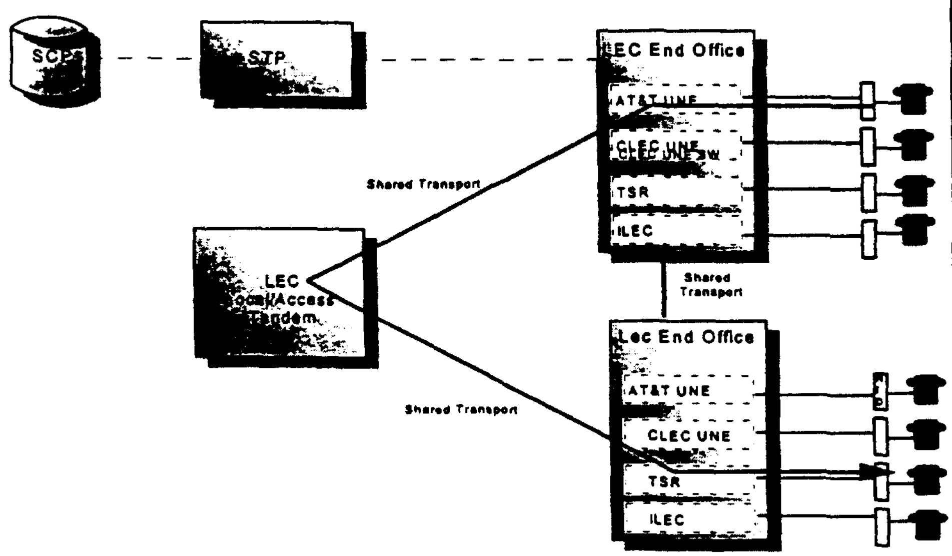
When one CLEC provides local exchange service using TSR arrangements and another CLEC provides local exchange service using UNE arrangements, the call flows between two switches are as follows:

11. CLEC (TSR) Originating and CLEC (UNE) Terminating



This callflow is the same as #7.

12. CLEC (UNE) Originating and CLEC (TSR) Terminating

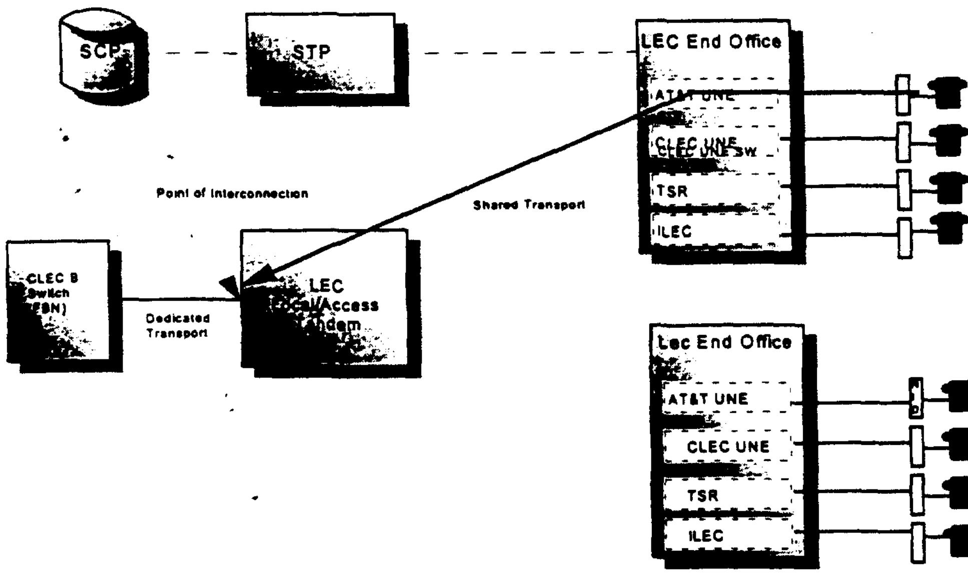


This callflow is the same as #6.

UNBUNDLED NETWORK ELEMENTS / FACILITY BASED NETWORK

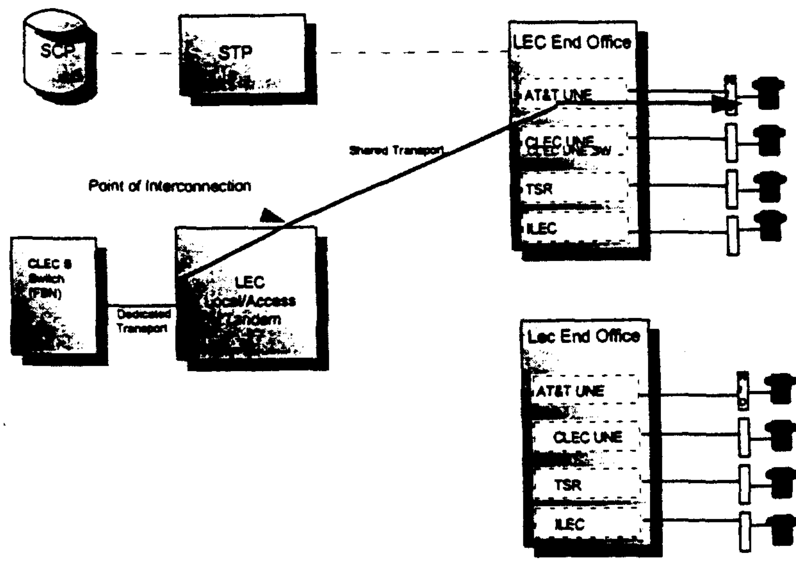
When one CLEC provides local exchange service through UNE arrangements and another CLEC provides local exchange service through its facility based network (FBN), the call flows are as follows:

13. CLEC (UNE) Originating to CLEC (FBN) Terminating



The ILEC will bill the originating CLEC for one originating UNE switching charge and a shared transport charge (or common transport and tandem switching) to the point of interconnection with the terminating carrier's facility based network. The terminating CLEC must deal directly with the originating CLEC for reciprocal compensation, unless they have agreed upon a bill and keep arrangement. [In the absence of detailed recording, it may appear to the terminating CLEC that the call originated from the ILEC. If no terminating charge is imposed on the ILEC by the terminating CLEC, then no terminating charge should be imposed on the originating CLEC. If a terminating charge is imposed on the ILEC, then it should be passed through in the same amount to the originating CLEC.]

14. CLEC (FBN) Originating to CLEC (UNE) Terminating



The ILEC will bill the terminating CLEC for one UNE terminating switching charge and a transport charge from the point of interconnection with the originating carrier's network. The originating CLEC (B) is paying for the dedicated transport and the tandem switching.

An equally acceptable alternative is for the ILEC to bill the terminating CLEC for one UNE terminating switching charge and to bill the originating CLEC for the dedicated transport (if provided by the ILEC), the tandem switching and for the common transport from the point of interconnection to the end office.

In either case, the terminating CLEC must deal directly with the originating CLEC for reciprocal compensation. [In the absence of detailed recording, it may appear to the terminating CLEC that the call came from the ILEC. In that situation, the terminating CLEC may bill the ILEC for terminating the call and the ILEC may in turn bill the originating CLEC.]

TOLL CALLS - INTRALATA

The following call flows assume that the calls are routed entirely through the ILEC network and that the originating CLEC is also the intraLATA toll provider. If intraLATA calls are to be routed to an IXC point of presence, then the call flows described under section titled TOLL CALLS - INTRASTATE/INTERLATA should be used. The call flows also assume that access charge reform has not been accomplished, and that the state has adopted the FCC's transitional application of the CCL and 75% of the RIC in its state access tariffs.

Even if access reform has happened, the FCC rules on the application of CCL and RIC to UNE switching elements will be applied as described below. If the state has not adopted the FCC's transitional plan, then that state's CCL and full RIC charges apply. For states that do not have a CCL or the equivalent of the RIC, those charges will not apply. In any case, such transitional charges will end upon the earlier of 6/30/97, RBOC in-region entry, or state access charge reform.

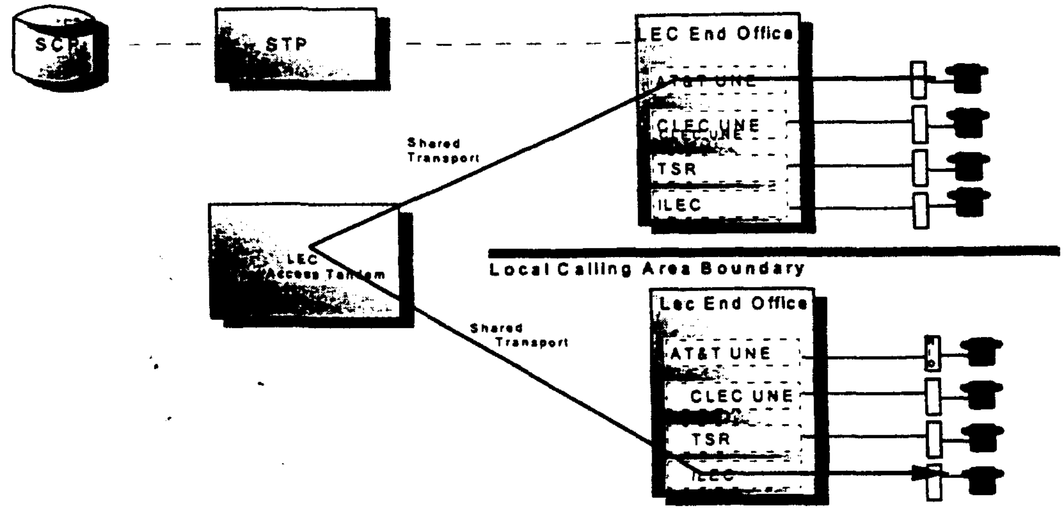
TOTAL SERVICE RESALE:

When a CLEC provides local exchange service through TSR arrangements, the intraLATA call flows between the CLEC and the ILEC or between two CLECs are not different from the intraLATA call flows between two ILEC customers. If the intraLATA toll provider is not the ILEC, the ILEC will charge the intraLATA toll provider for intrastate access charges. CLEC TSRs may resell ILEC intraLATA toll. No access charges would apply.

UNBUNDLED NETWORK ELEMENTS:

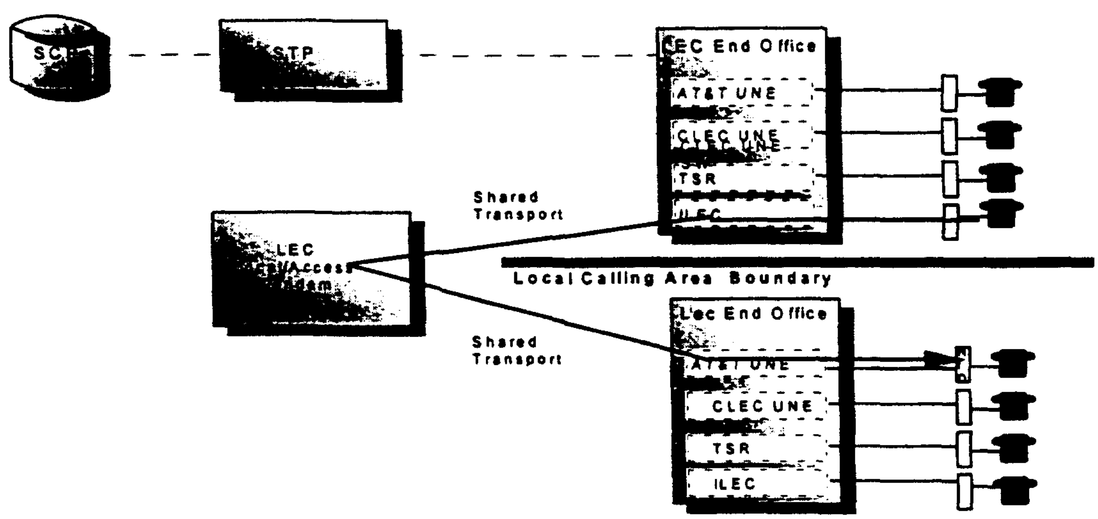
When a CLEC provides local exchange service through UNE arrangements, the intraLATA call flows are as follows. These scenarios assume that the originating CLEC is also the intraLATA toll provider.

15. CLEC Originating to ILEC Terminating



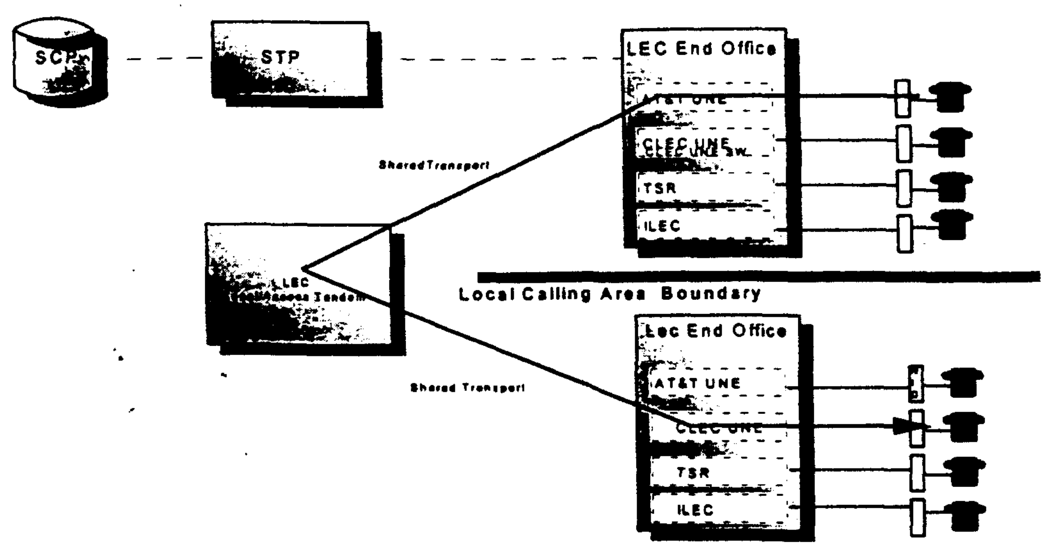
The ILEC will charge the CLEC one UNE originating switching charge and shared transport to the terminating end office, plus intrastate access charges for the discounted RIC and the CCL at the originating end, if applicable. AT&T prefers a blended transport and tandem rate that reflects the percent of intraLATA toll calls that use tandem switching. The CLEC as an intrastate toll provider will pay intrastate access charges for the CCL, undiscounted RIC and Local Switching charge at the terminating end.

16. ILEC Originating to CLEC Terminating



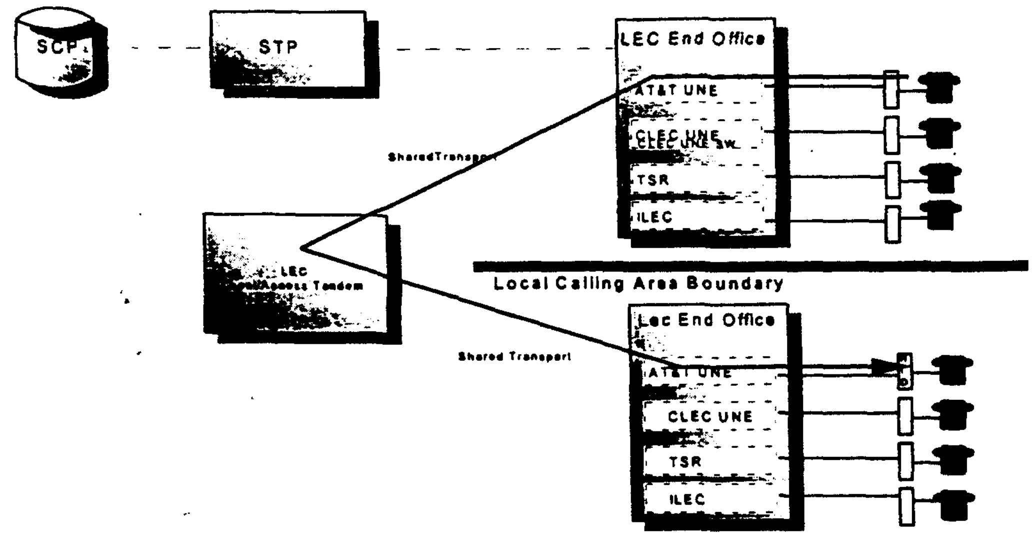
The ILEC will charge the CLEC for one UNE terminating switching charge, CCL and discounted RIC, if applicable. In return, the CLEC may impose terminating intrastate access charges through tariffed access rates on the ILEC for the CCL, RIC and Local Switching.

17. CLEC A Originating to CLEC B Terminating



The ILEC will charge the originating CLEC (AT&T) for one UNE switching charge , shared transport to the terminating end office, CCL and discounted RIC, if applicable. The ILEC will charge the terminating CLEC (B) the CCL and discounted RIC, and terminating UNE switching. AT&T prefers a blended transport and tandem rate. The terminating CLEC (B) must deal directly with the originating CLEC (AT&T) for recovery of the access charges.

18. CLEC A Originating to CLEC A Terminating

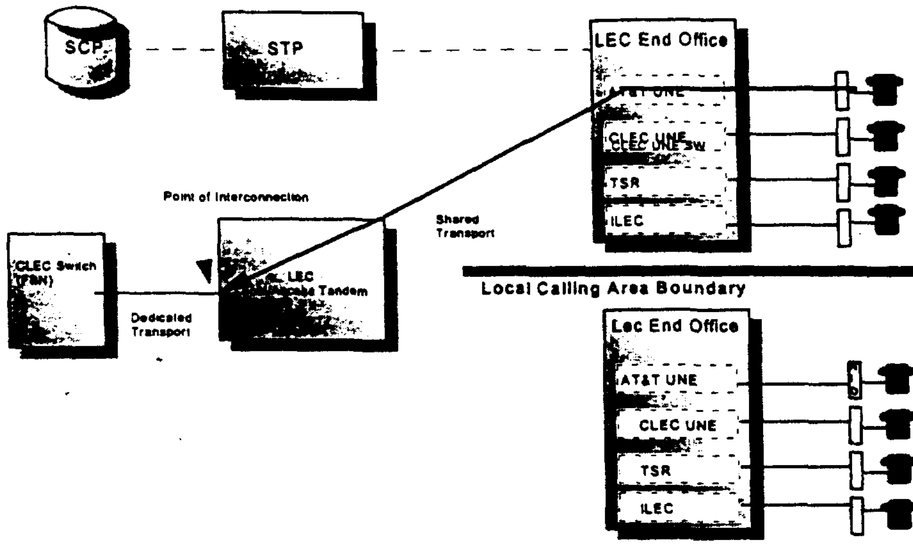


The ILEC will charge CLEC A two UNE switching charges, one for the originating end and one for the terminating end and shared transport between the end offices, the CCL and the discounted RIC at each end, if applicable. AT&T prefers a blended transport and tandem rate.

UNBUNDLED NETWORK ELEMENTS / FACILITY BASED NETWORKS

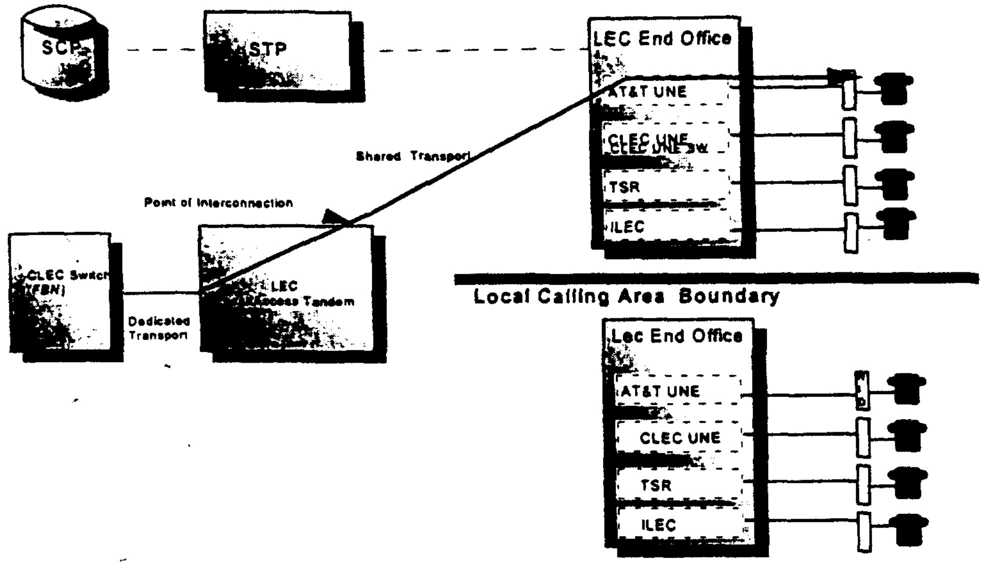
When one CLEC provides local exchange service through UNE arrangements and another CLEC provides local exchange service through its facility based network, the call flows for intraLATA toll calls are as follows.

19. CLEC (UNE) Originating to CLEC (FBN) Terminating



The ILEC will charge the originating CLEC (AT&T) one UNE originating switching charge and shared transport to the point of interconnection with the terminating CLEC's network plus the originating intrastate access charges for CCL and discounted RIC charge, if applicable. AT&T prefers a blended transport and tandem rate. The terminating CLEC must deal directly with the originating CLEC for recovery of terminating access charges. [In the absence of detailed recording, it may appear to the terminating CLEC that the call originated from the ILEC. If no terminating charge is imposed on the ILEC by the terminating CLEC, then no terminating charge should be imposed on the originating CLEC. If a terminating charge is imposed on the ILEC, then it should be passed through in the same amount to the originating CLEC.]

20. CLEC (FBN) Originating to CLEC (UNE) Terminating



The ILEC will charge the terminating CLEC (UNE) one UNE terminating switching charge and a transport charge from the point of interconnection with the originating CLEC's network plus the terminating intrastate access charge for CCL and discounted RIC, if applicable. The originating CLEC (FBN) is paying for the dedicated transport and the tandem switching.

An equally acceptable alternative is for the ILEC to bill the terminating CLEC for one UNE terminating switching charge (plus the applicable intrastate access charges) and to bill the originating CLEC for the dedicated transport (if provided by the ILEC), the tandem switching and for the common transport from the point of interconnection to the end office.

In either case, the terminating CLEC must deal directly with the originating CLEC for the recovery of access charges. [In the absence of detailed recording, it may appear to the terminating CLEC that the call came from the ILEC. In that situation, the terminating CLEC may bill the ILEC for terminating the call and the ILEC may in turn bill the originating CLEC.]

TOLL CALLS - INTRASTATE / INTERLATA

The following call flows assume that all calls are routed to an IXC point of presence. The IXC may be the CLEC's own IXC or another, non-affiliated IXC, and that the IXC is purchasing all the necessary transport from the ILEC. The call flows also assume that access charge reform has not been accomplished, that the state has adopted the FCC's transitional application of the CCL and 75% of the RIC to UNE customers, and that the ILEC has a CCL and the equivalent of the RIC in its state access tariffs.

Even if access reform has happened, the FCC rules on the application of CCL and RIC to UNE switching elements will be applied as described below. If the state has not adopted the FCC's transitional plan, then that state's access charges apply. For states that do not have a CCL or the equivalent of the RIC, those charges will not apply.

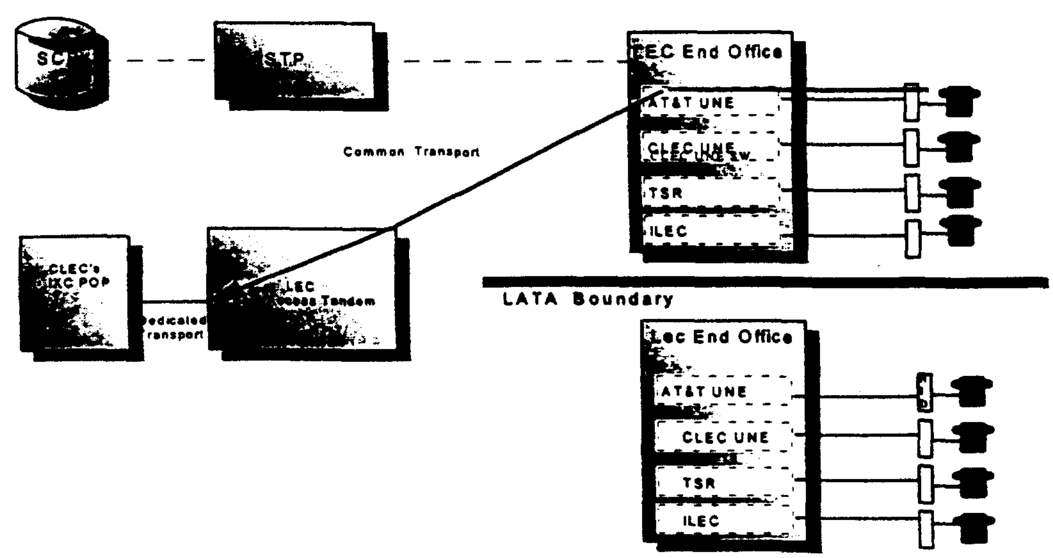
TOTAL SERVICE RESALE

When a CLEC provides local exchange service through TSR arrangements, the ILEC will provide and bill intrastate access charges to the IXC for intrastate/interLATA toll calls.

UNBUNDLED NETWORK ELEMENTS

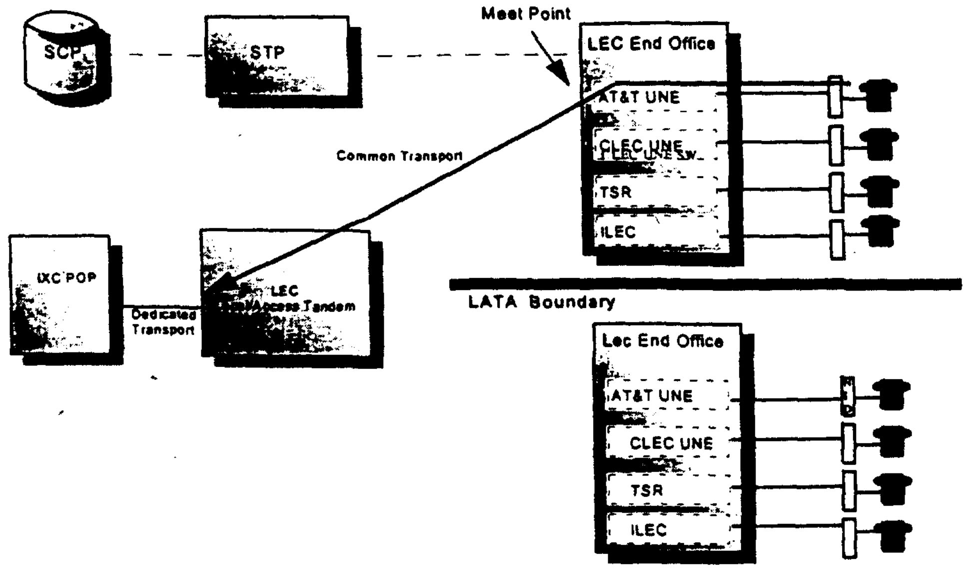
When a CLEC provides local exchange service through UNE arrangements, the call flows for intrastate/interLATA toll calls are as follows:

21. CLEC (UNE) Originating to CLEC's IXC



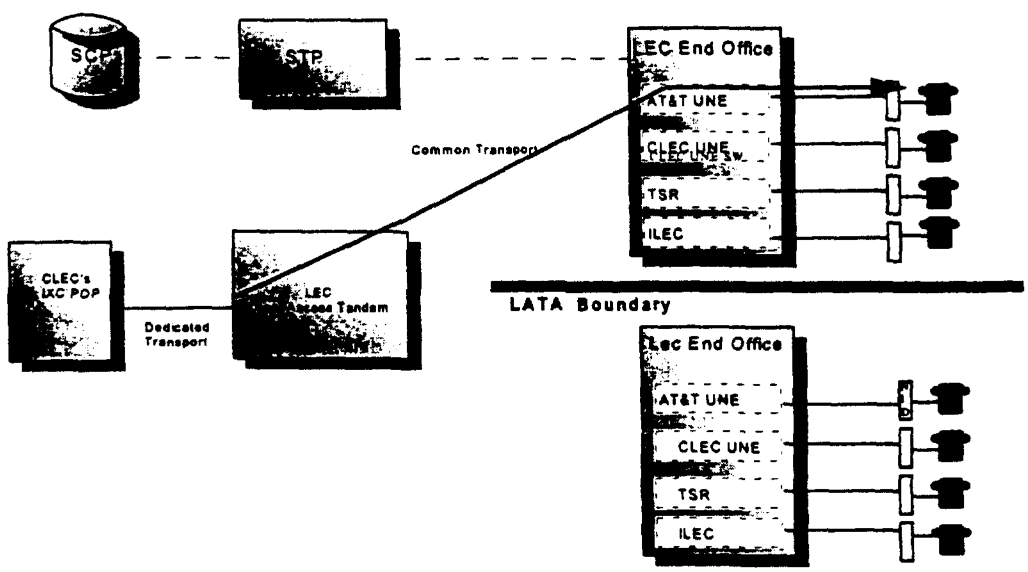
The ILEC will charge the CLEC one UNE originating switching charge plus the intrastate switched access charges for the CCL, and the discounted RIC, if applicable.

22. CLEC (UNE) Originating to a Non-Affiliated IXC



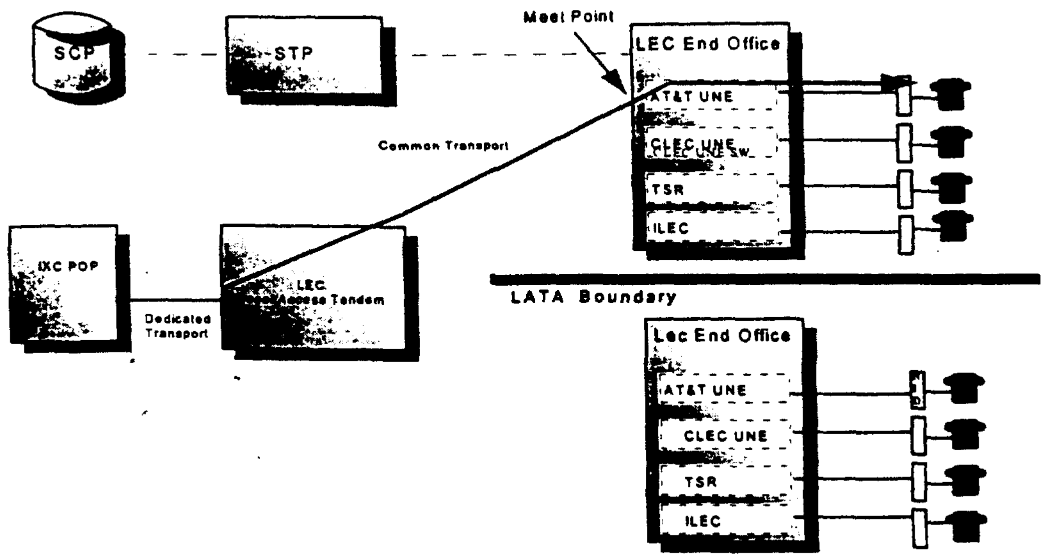
The ILEC will charge the CLEC one UNE switching charge, CCL and discounted RIC. The CLEC and the ILEC will develop meet-point billing arrangements to charge the IXC for originating switched access. The CLECs share of the meet-point billing arrangement will be its CCL, the RIC and Local Switching charges.

23. CLEC (UNE) Terminating from CLEC's IXC



The ILEC will charge the CLEC one UNE terminating switching plus the intrastate switched access charges for the CCL, and discounted RIC, if applicable.

24. CLEC (UNE) Terminating from Non-Affiliated IXC



The ILEC will charge the CLEC one UNE terminating switching charge, CCL and discounted RIC. The CLEC and the ILEC will develop meet-point billing arrangements to charge the IXC for terminating switched access. The CLECs share of the meet-point billing arrangement will be its CCL, the RIC and Local Switching charges.

FACILITY BASED NETWORKS

When a CLEC provides local exchange service through its facility based network, the CLEC may independently offer and bill exchange access services to its own or other IXCs, either alone or in a meet-point billing situation with the ILEC or with other CLECs.

TOLL CALLS - INTERSTATE

The following call flows assume that all calls are routed to an IXC point of presence. The IXC may be the CLEC's own IXC or another, non-affiliated IXC, and that the IXC will purchase all the necessary transport from the ILEC. The call flows also assume that access charge reform has not been accomplished and the FCC's transitional application of the CCL and 75% of the RIC to UNE customers is in effect.

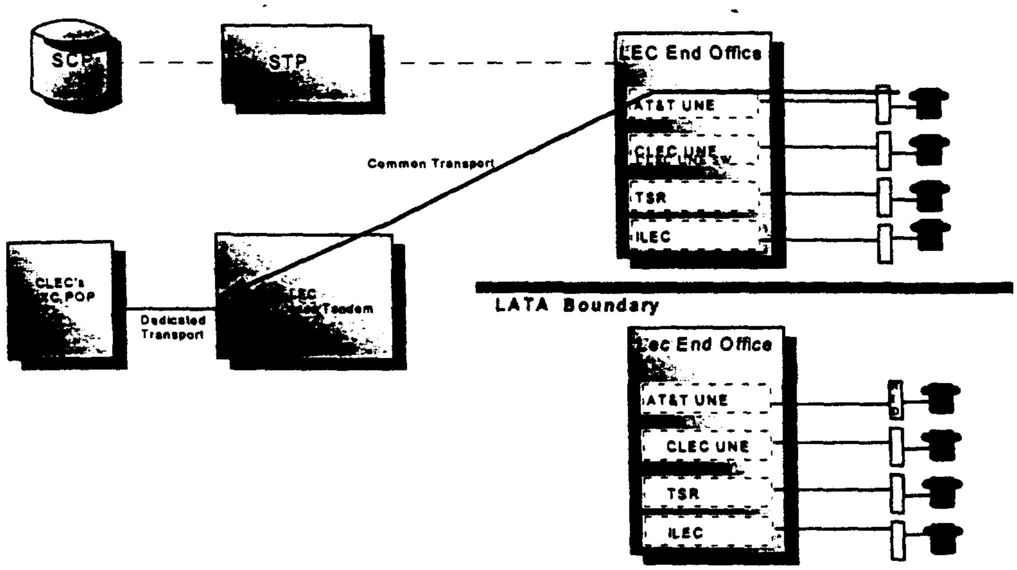
TOTAL SERVICE RESALE

When a CLEC provides local exchange service through TSR arrangements, the ILEC will provide and bill interstate access charges to the IXC for interstate toll charges.

UNBUNDLED NETWORK ELEMENTS

When a CLEC provides local exchange service through UNE arrangements, the call flows for interstate toll calls are as follows:

25. CLEC (UNE) Originating to CLEC's IXC



The ILEC will charge the CLEC one UNE originating switching chargeplus the interstate switched access charges for the CCL, and 75% of the RIC.